

Attachment A



U. S. Department of Justice

United States Attorney
 Eastern District of Washington
 Suite 340 Thomas S. Foley U. S. Courthouse
 P. O. Box 1494
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March 28, 2022

Re: United States v. Yaser et al.,
 Court No. 21-CR-06042-SMJ-22

Discovery Disclosure Production to John Ellis (Leyla Parisi, Beth Petrassi, Bella Sung)

Dear Mr. Ellis:

The following table details in bold what is being disclosed as part of this disclosure. This disclosure is being provided to you through two USB drives provided by your office. This production consists of Pole Camera Videos in USAO's possession as well additional Data and Text files requested by your office.

Disclosure	Description	Date of Production
1	10000001 – 10002606: FBI Reports & Investigative Materials 20000001 – 20000354: CHS Audio Files 30000030-30000077, 30000112-30000114, 30000117-30000129, 30000136-30000137: Search Warrants ¹ 40000001 – 40000018: Additional Reports 50000001 – 50000015: Recorded Interviews 60000001 – 60006522: Claim Files 70000001 – 70000544: Bank Records 80000001 – 80000689: Other Disclosures	March 17, 2022 Via USAfx
2	30000000- 30000029, 30000078- 30000111, 30000114-30000116, 30000130- 30000135: SD CA Search Warrants 90000001- 90000004: Grand Jury Transcripts	March 17, 2022 Via USAfx
3	10002607-10003081: FBI Reports & Investigative Materials 80000690-80000696: Additional Criminal Histories 90000005-90000006: Grand Jury Transcripts 11000001-11000021: Jail Calls	March 17, 2022 Via USAfx
4	10003082- 10003083: FBI Reports & Investigative Materials 80000697- 80000715: Other Disclosures 12000001-12000233: CHS Communications with Agent 13000001-13000024: HHS-OIG Discovery	Provided To Ellis Law in Replica
Ellis (1)	Provided Replica of Eclipse Database.	March 15, 2022 Via USB Drive
Ellis (2)	Pole Camera Videos Produced Data and Text Files for all disclosure as requested	March 28, 2022 Via USB Drive

Please be advised that all materials disclosed to you in this cause are subject to all terms and conditions of the Protective Order (ECF Nos. 176 and 252). You hereby affirm that **no copies shall be disseminated** to any person without the expressed written approval of the United States Attorney's Office

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and/or Court order. This agreement is not intended to prevent you from discussing the discovery materials with your client or providing materials to your client, but it is incumbent on you and your client to ensure that any discovery materials are used solely for the purpose of your client's defense and that sensitive information or other materials are not left in your client's possession or are redacted as necessary.

At this time, the United States anticipates additional discovery materials will be provided as they are received and processed by the U.S. Attorney's Office. Additional discovery material is likely to include, but may not be limited to, grand jury transcripts, electronically stored information (ESI) (e.g., digital forensic copies of electronic devices), video surveillance (i.e., pole cam footage), law enforcement reports, and other documents (including but not necessarily limited to any Giglio / Henthorn material) that may be relevant to this matter.

Numerous electronic devices were seized by the FBI pursuant to the search warrants executed during the investigation. Each device seized is identified in the search warrant returns. The FBI imaged most, but not all of the devices. If you would like copies of all electronic devices that the FBI seized and was able to image, please send an external hard drive containing at least 14 TBs of storage capacity directly to FBI Special Agent Matthew McKay, at the FBI Office, Suite 199, 825 Jadwin Avenue, Richland, Washington, 99352. Special Agent McKay will then send your external hard drive to the FBI CART Unit in Seattle, Washington, to process the seized and imaged ESI on to your hard drive. If you do not want all the ESI but only a copy of the ESI that may have been seized from your client (Note: ESI was not seized from every named defendant) or a particular co-defendant(s), please let us know. As a further note, ESI the FBI seized from defendant Maria Elena Sanchez is still undergoing a filter review for potential attorney-client privilege information and has not been made available to the prosecution team. If you have any questions about this particular ESI, please contact Assistant United States Attorneys George J. C. Jacobs, III or Dominique Juliet Park.

Physical evidence is available for your inspection by contacting Assistant United States Attorneys George J.C. Jacobs, III or Dominique Juliet Park to arrange a mutually convenient date and time.

Very truly yours,

Vanessa R. Waldref
United States Attorney

s/ George J.C. Jacobs, III
George J.C. Jacobs, III
Dominique Juliet Park
Assistant United States Attorneys